

**REMARKS**

Entry of this Amendment is believed proper under 37 CFR § 1.116 since no new issues are being presented to the Examiner which would require further consideration and/or search.

Claims 1 and 3-41 are all the claims presently pending in the application. Claim 13 is amended to more clearly define the invention. Claim 2 is canceled.

These amendments are made only to more particularly point out the invention for the Examiner and not for narrowing the scope of the claims or for any reason related to a statutory requirement for patentability.

Applicants also note that, notwithstanding any claim amendments herein or later during prosecution, Applicants' intent is to encompass equivalents of all claim elements.

Claims 1 and 3-41 stand rejected under 35 U.S.C. §102(b) as being anticipated by Chandra, et al. (U.S. Publication No. 2002/0138582).

This rejection is respectfully traversed in the following discussion.

**I. THE CLAIMED INVENTION**

An exemplary embodiment of the claimed invention, as recited by, for example, independent claim 1, is directed to a method of discovering a business object definition that includes receiving an object and a collaboration code, and determining a business object definition for the object based upon the collaboration code. The collaboration code determines the business object definition for the object without pre-defined business object definitions, if the object does not conform to a known business object definition.

Conventional systems and methods may include object discovery agents that produce

business object definitions that include mapping information between object attributes and data fields in the application data sources. However, these methods and systems must subscribe in advance to the pre-defined business object definitions, and can only exchange business objects of the business object definitions. Changes in business object definitions often render these conventional systems and methods useless. Further, these systems and methods often need to subscribe to a very large number of business object definitions. (See Application from page 2, lines 15-25 to page 3, lines 1-20).

In contrast, the present invention is capable of dynamically determining a business object definition for an object based upon the collaboration code, without need to include pre-defined business object definitions. (See Application at page 6, lines 15-22). Thus, the present invention is capable of reverse engineering the composition of a business object to dynamically discover a business object definition, thereby obviating the above-described problems.

## II. THE PRIOR ART REJECTION

The Examiner alleges that Chandra teaches or suggests the all of the claimed features as recited by claims 1 and 3-41. Applicants submit, however, that there are elements of the claimed invention which are neither taught nor suggested by Chandra.

Claim 1 recites, inter alia:

"receiving an object and a collaboration code;  
determining a business object definition for said object based upon said  
collaboration code;"  
storing said business object definition,  
wherein said collaboration code determines said business object definition  
for said object without pre-defined business object definitions, if the object does  
not conform to a known business object definition."

Support for the claimed features of claim 1 may be found in at least page 10, line 15-page 14, line 8 of the Specification.

Claims 13, 20, 25, and 33 recite similar features as those recited by claim 1.

In contrast, the Examiner attempts to reject the claim by citing an unrelated reference. That is, Chandra merely teaches submitting an object and then some pre-registered logic stored in database, and based on the pre-registered logic, the system then decides how to process the transmitted object.

However, Chandra is different from the claimed invention in that with the claimed invention, a reverse engineering is performed to “discover dynamically” from the received object and collaboration code, without having to look up a database for processing an earlier-registered logic.

Also, in reviewing the anticipation standard, the Federal Circuit has stated, “to anticipate, every element and limitation of the claimed invention must be found in a single prior art reference, arranged as in the claim. *“Brown v. 3M*, F.3d 1349, 1351, 60 USPQ2d 1375 (Fed. Cir. 2001), *cert. denied*, 122 S. Ct. 1436 (2002) (emphasis added). Additionally, other court precedent clarifies the requirement for anticipation, stating that “the reference...must clearly and unequivocally disclose the claimed compound or direct those skilled in the art to the compound without any need for picking, choosing, and combining various disclosures not directly related to each other by the teachings of the cited reference.” *In re Arkley*, 455 F.2d 586, 587, 172 USPQ 524 (CCPA 1972); *see also Sandisk Corp. v. Lexar Media, Inc.*, 91 F. Supp. 2d 1327, 1336 (N.D. Calif. 2000)(stating that “[u]nless all the elements are found in a single piece of prior art in exactly the same situation and united the same way to perform the identical function, there is no anticipation.”) and *Aero Industries*

*Inc. v. John Donovan Enterprises-Florida Inc.*, 53 USPQ2d 1547, 1555 (S.D. Ind.

1999)(stating that “[n]ot only must a prior patent or publication contain all of the claimed elements of the patent claim being challenged, but they ‘must be arranged as in the patented device’”).

This standard for anticipation is also set forth in MPEP § 2131, which states that “the identical invention must be shown in as much detail as is contained in the ...claim.” Further, although the same terminology need not be used, “the element must be arranged as required by the claim.”

Here, the Examiner continues to err by relying on paragraphs 404 and 825 of Chandra to allege that Chandra teaches or suggests, “receiving an object and a collaboration code,” (Office Action, page 2, paragraph 2, line 5). That is, the Examiner appears to allegedly equate Chandra’s “receive presentation data object from building block method” (block 1610 in paragraph 404) as the claimed “receiving an object” of the claimed invention, by relying on a process of presenting building block information described by figure 16. However, the Examiner then improperly picks and chooses another unrelated part of Chandra by attempting to equate Chandra’s received code (that) may be executed by processor 1904 as it is received in paragraph 825 as the “collaboration code” of the claimed invention out-of-context, by relying on a different and unrelated computer system 1900 embodiment described by figure 19. (Office Action, page 2, paragraph 2, line 5).

In her response to (Applicants’) arguments, the Examiner merely repeats her allegations on where Chandra teaches or suggests the claim elements while failing to address the points raised by the Applicants. (i.e., how paragraphs 404 and 825, or how Chandra’s step of receiv(ing) presentation data object is even related to Chandra’s computer system 1900

receiving a code that may be executed by processor 1904). (Office Action, page 12, lines 4-8). Here, the Examiner appears to merely conduct a text search without considering the meaning of the text within the context of the reference, or understanding what Chandra fairly teaches or suggests to one of ordinary skill in the art.

Therefore, the Examiner has failed to meet her burden to prove that Chandra teaches or suggests, “receiving an object and a collaboration code.”

Further, the Examiner then relies on paragraph 653 of Chandra to allege that Chandra teaches or suggests, “determining a business object definition for said object based upon said collaboration code.” (Office Action, page 3, lines 4 and 5). That is, the Examiner appears to attempt equating Chandra’s access control definition in paragraph 653 as the “business object definition” of the claimed invention. However, paragraph 653 refers to yet another embodiment unrelated to either paragraph 404 or 825. That is, paragraph 653 merely teaches that the intersection of the transportable application access control definition and the recipient access control definition indicates whether a particular recipient can access an application, which is unrelated to Chandra’s received presentation data object as described in paragraph 404, or received code (that) may be executed by processor 1904 as described in paragraph 825. Indeed the Examiner has not explained, and Chandra fails to teach or suggest, how Chandra’s access control definition is even related to the presentation object 1610, or that the access control definition is indeed be determined based on Chandra’s received code. Instead, in her response to (Applicants’) arguments, the Examiner merely repeats her allegations on where Chandra teaches or suggests the claim elements without addressing the points raised by the Applicants. (Office Action, page 12, lines 4-9). The Examiner also erroneously interprets the claimed language by injecting her own inaccurate

summary characterization of the claimed features without any factual support for her allegations, and without fully understanding what the reference fairly teaches or suggests to one of ordinary skill in the art.

Further, Chandra's access control definitions are additionally different from the claimed "business object definition" in that Chandra access control definitions must be created by an author, (See paragraph 653, lines 8-9), while the claimed "business object definition" is determined "based upon said collaboration code." Again, the Examiner has not alleged, and Chandra fails to teach or suggest that the access control definition is indeed be determined based on Chandra's received code.

Therefore, the Examiner has failed to meet her burden to prove that Chandra teaches or suggests, "determining a business object definition for said object based upon said collaboration code."

Also, the Examiner relies on paragraph 200 of Chandra to allege that Chandra teaches or suggests "storing said business object definition" of the claimed invention. However, paragraph 200, as illustrated by Figure 2, refers to yet another embodiment of system architecture that is unrelated to the various embodiments described by previous paragraphs 404, 825, and 653. Indeed, paragraph 200 merely teaches that one or more application servers 202 host containers in the form of Enterprise Java Beans 204 and store programmatic objects representing containers, building blocks, pages, and transportable applications in a cache 206, (lines 1-4), and fails to teach or suggest that Chandra's access control definition is indeed stored.

In her response to (Applicants') arguments, the Examiner again merely repeats her allegations on where Chandra teaches or suggests the claim elements without addressing the

points raised by the Applicants. (Office Action, page 12, lines 11-18). The Examiner also erroneously interprets the claimed language by injecting her own inaccurate summary characterization of the claimed features without any factual support for her allegations, and without fully understanding what the reference fairly teaches or suggests to one of ordinary skill in the art.

Therefore, the Examiner has failed to meet her burden to prove that Chandra teaches or suggests, “storing said business object definition.”

Further, the Examiner again relies on paragraph 200 of Chandra to allege that Chandra teaches or suggests, “wherein said collaboration code determines said business object definition for said object without pre-defined business object definitions, if the object does not conform to a known business object definition.” (Office Action, page 3, lines 7-10). However, the Examiner has not identified which structure of Chandra corresponds, and Chandra fails to teach or suggests “predefined business object definitions,” or “a known business object definition.” Also, as discussed previously, paragraph 200, as illustrated by Figure 2, refers to yet another embodiment of system architecture that is unrelated to the various embodiments described by previous paragraphs 404, 825, and 653. While Chandra teaches that Application servers 202 execute code of the containers and building blocks and call servers and services in a services domain 201 to result in servicing client request in paragraph 200, the Examiner has not explained how this section is related to Chandra’s received code or application code in paragraph 825 (the alleged collaboration code), Chandra’s access control definition in paragraph 653 (the alleged business object definition), or Chandra’s presentation data object 1610 in paragraph 404 (the alleged object). Indeed, neither paragraph 200 of Chandra, nor the rest of Chandra, teaches or suggests that Chandra’s

received code or application code may even be able to determine the access control definition for the presentation data object 1610 “*without predefined business object definitions*,” and under the condition, “*if the object does not conform to a known business object definition*.” As a matter of fact, the Examiner concedes in her response to the Applicants’ arguments that Chandra relies on previous definitions (i.e., predefined definitions), without teaching or suggesting, “*wherein said collaboration code determines said business object definition for said object without pre-defined business object definitions*,” under the condition, “*if the object does not conform to a known business object definition*.”

In her response to (Applicants’) arguments, the Examiner again merely repeats her allegations on where Chandra teaches or suggests the claim elements without addressing the points raised by the Applicants. (Office Action, page 13, lines 5-13). The Examiner also erroneously interprets the claimed language by injecting her own inaccurate summary characterization of the claimed features, without any factual support for her allegations, and without fully understanding what the reference fairly teaches or suggests to one of ordinary skill in the art.

Therefore, the Examiner has failed to meet her burden to prove that Chandra teaches or suggests, “*wherein said collaboration code determines said business object definition for said object without pre-defined business object definitions, if the object does not conform to a known business object definition*.”

Applicants further point out that claims 3 and 14, recite, as exemplified by claim 3, “*wherein said determining the business object definition for said business object comprises reverse engineering said business object to examine how the business object was obtained*,” and claims 14, 20 recite “*a reverse object discovery agent*.” Support for these claims may be

found in at least, page 11, line 32-page 12, line 14 and page 13, line 8 to page 14, line 8 of the Specification.

In contrast, the Examiner erred by erroneously interpreting the claimed language by injecting her own inaccurate summary characterization of the claimed features without any factual support for her allegations, and without fully understanding what the reference fairly teaches or suggests to one of ordinary skill in the art.

The Examiner also relies on paragraph 653 of Chandra to allege that Chandra teaches or suggests, “*wherein said determining the business object definition for said business object comprises reverse engineering said business object to examine how the business object was obtained.*” However, paragraph 653 of Chandra merely teaches that the intersection of the transportable access control definition and the recipient access control definition indicates whether a particular recipient can access an application, and is silent regarding reverse engineering of the presentation data object (as described in paragraph 404 and alleged by the Examiner as the claimed “*object*”). In fact, as described previously, paragraphs 653 and 404 each describes different embodiments of Chandra that are unrelated to each other. Here, the Examiner failed to even address how the two paragraphs, or how the transportable access control definition and the recipient access control definition are related to the presentation data object.

The Examiner further fails to point out where Chandra teaches or suggests the above-recited structural features of claims 14 and 20. (See Examiner’s rejection of the claims on page 3, lines 11-12, page 5, lines 3-4, and page 7, lines 1-3 of the Office Action).

Also, claim 40 recites, inter-alia, “*wherein determining the business object definition for said object without pre-defined business object definitions comprises: determining a*

*mapping information by determining how a plurality of business objects was merged to create the received object; creating the business object definition based on the determined mapping information; sending the created business object definition to an adapter; and subscribing to the new business object definition.*

However, the Examiner does not even allege, and Chandra does not even teach or suggest the above-recited features of claim 40. Instead, the Examiner appears to have misnumbered claims 34-39 as claims 35-40, without addressing the actual claim 40 at all.

Further, claim 41 recites, inter-alia, “*wherein said receiving the object and the collaboration code is performed before said determining the business object definition, and wherein said storing the business object definition is performed before said determining the business object definition.*”

The Examiner alleges that Chandra teaches or suggest the claimed features of claim 41 by relying again on paragraphs 404, 825, and 653. (Office Action, page 10, line 15). However, as previously discussed, paragraphs 404, 825 and 653 each describes a different embodiment of Chandra, with terms that are unrelated to each other, and fails to teach the claimed features of claim 1 as arranged in the claim, from which claim 41 also includes similar features. Chandra also fails to teach or suggest the sequence in which the descriptions of paragraphs 404, 825, and 653 are performed, contrary to the Examiner’s allegations. Therefore, the Examiner has failed to meet her burden to prove that Chandra teaches or suggests, “*wherein said receiving the object and the collaboration code is performed before said determining the business object definition, and wherein said storing the business object definition is performed before said determining the business object definition.*”

Since there are features of the claims that are neither taught nor suggested by the above-cited reference, reconsideration and withdrawal of the rejections is respectfully requested.

### **III. FORMAL MATTERS AND CONCLUSION**

In view of the foregoing amendments and remarks, Applicants respectfully submit that claims 1 and 3-41, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the Application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

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